

Cyprus Miami Mining Corporation Post Office Box 4444 Claypool, Arizona 85532

January 14, 1994

Certified Mail No. P036332020

EPA, Region IX, Regional Administrator Toxics and Waste Management Division 215 Fremont Street San Francisco, CA 94105

R00337394 RCRA RECORDS CENTER

RE: Manifest Discrepancy, Manifest Document No. 00584; Mo. Manifest Document No 0054

Generator: Litton Systems, ACD EPA ID No. MOD007152903

Transporter: Tri-State Motor Transit Co. EPA ID No. MOD095038998 Facility: Cyprus Miami Mining Corp, EPA ID No. AZD060624251

Receive Date: 01/06/94

In accordance with 40 CFR 265.72, Manifest Discrepancies, Cyprus Miami Mining Corporation (Cyprus Miami) herein describes an unresolved manifest quantity/count discrepancy and the attempts to resolve.

On January 6, 1994, Cyprus Miami received a shipment, Appointment 5002, from Litton Systems, ACD on Manifest Document No. 00584, Missouri Manifest Document No. 0054. The number of containers (12.) indicated on the manifest was 22, and the total quantity (13.) indicated was 22 Y. However when the shipment was unloaded and counted by the receiving personnel, the receiver indicated there were 20 bag containers and corresponding 20 Y. The following events occurred.

- 1. The driver for the transporter when first questioned thought the manifest number of 22 should be correct as he said he remembered counting during loading. He stated the van had not been opened since it was loaded at the generator's facility.
- 2. Cyprus Miami personnel recounted the bags and examined the unloading area to see if any containers were overlooked. No containers had been emptied into the receiving hopper. There were no other bag containers received that day. Recount by two different Cyprus Miami personnel confirmed receipt of 20 containers.
- 3. The generator, Litton's Mr. Neil Schaffer was contacted about the discrepancy. Mr. Schaffer checked with his loading personnel and they confirmed to him that the shipment was counted prior to shipment and the count was 22.
- 4. While the facility was talking to the generator about the discrepancy, the driver then began to recall that the generator was going to ship a full load of 22 bags but due to icy conditions after loading 9 bags side by side, two bags per row, (for a total of 18) they could not get the last two rows into the van so only two more bags were loaded at the end of van, for a total of 20 bags. The receiving personnel later verified that the van was loaded 9 rows of two and that the last two rows had only one bag each and they were more diagonal to each other.

  RCRA FILE COPY

MODOO7152903

DOCUMENT # 131

- 5. Cyprus Miami personnel and the driver counted the bags again and confirmed that only 20 bag containers were received.
- 6. The generator was again contacted and apprised of the recount and what the driver had remembered. The generator advised that they would continue their investigation and get back to Cyprus Miami. However at this time, generator's personnel maintained shipment of 22 containers.
- 7. The transporter's driver was further questioned and maintained that the van trailer was not opened after loading until material was unloaded. The driver agreed that only 20 bags were received. The driver re-stated that he now remembered how the icy conditions caused only 20 containers to be loaded and that perhaps the generator and he made a mistake by putting 22 as the number on the manifest. Driver stated they counted by two's by row and that the last two rows only had one bag each which would result in a total of 20.
- 8. The manifest was signed with a discrepancy notation.
- 9. The generator advised that their personnel still maintain that they counted 22 bags on the trailer when it was shipped. Litton's personnel remembers counting each bag individually and not by rows.

Cyprus Miami concludes that most probably only 20 bags were shipped, at least only 20 were received. The material would be of no real value to anyone other than a copper smelter so there would be no reason to sell or abandon the material. Cyprus Miami believes that no foul play occurred other than poor memory or an honest mistake in the counting of the number of bag containers.

Janet Daniels
Production Coordinator, Resource Recycling
(602) 473-7135

Enclosure: Copy of Manifest

cc: EPA, Region VII

RCRA Branch
726 Minnesota Ave.
Kansas City, KA 66101

Missouri Department of Natural Resources Division of Environmental Quality Waste Management Program P. O. Box 176 Jefferson City, MO 65102

ADEQ Waste Assessment Unit, 5th Floor 3033 North Central Ave. Phoenix, AZ 85012

Litton Advanced Circuitry Division Tri-State Motor Transit Co.

littonmf.dis

INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

## URI DEPARTMENT OF NATURAL RESOURCE

Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 1-800-424-6802 CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCES 314-634-2436

## **HAZARDOUS WASTE MANIFEST**

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